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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRISTIAN HERNANDEZ-CARDENAS,
aka "Cristian Hernandez Cardenas,"
aka "Cristian Cardenas-Hernandez,"
aka "Cristian Hernandez,"
aka "Cristian Cardenas,"
aka "Cristian Cardenas Hernandez,"
aka "Jesus Haro Chavez,"

Defendant.

Case No. 2:21-mj-00944-DJA

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, and Rebecca A. Levy, Assistant Federal Public Defender, counsel for Defendant CRISTIAN HERNANDEZ-CARDENAS, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1 1. The United States Attorney's Office has developed an early disposition
2 program for immigration cases, authorized by the Attorney General pursuant to the
3 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
4 extended to the defendant a plea offer in which the parties would agree to jointly request an
5 expedited sentencing immediately after the defendant enters a guilty plea.

6 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
7 history until after the defendant enters his guilty plea unless the Court enters an order
8 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
9 a defendant's initial appearance when charged by indictment.

10 3. The U.S. Probation Office informs the government that it would like to begin
11 obtaining the criminal history of defendants eligible for the early disposition program as
12 soon as possible after their initial appearance so that the Probation Office can complete the
13 Presentence Investigation Report by the time of the expected expedited sentencing.

14 4. Accordingly, the parties request that the Court enter an order directing the
15 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

16 DATED this 8th day of November, 2021.

17 Respectfully Submitted,

18 RENE L. VALLADARES
19 Federal Public Defender

 CHRISTOPHER CHIOU
 Acting United States Attorney

20 /s/ Rebecca A. Levy
21 REBECCA A. LEVY
22 Assistant Federal Public Defender
23 Counsel for Defendant CRISTIAN
24 HERNANDEZ-CARDENAS

/s/ Jared L. Grimmer
 JARED L. GRIMMER
 Assistant United States Attorney

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CRISTIAN HERNANDEZ-CARDENAS,

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**Order Directing Probation to Prepare
a Criminal History Report
[Proposed]**

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 9th day of November, 2021.



HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE